

Joint Modern Slavery Statement

FY2020 - 2021 CPL - Choice, Passion, Life









Modern Slavery Act 2018

The *Modern Slavery Act 2018* (Act) has established Australia's national Modern Slavery Reporting Requirement (Reporting Requirement). The Australian Parliament passed the Act on 29 November 2018 and the Reporting Requirement entered into force on 1 January 2019.

In accordance with the Act, CPL – Choice, Passion, Life **(CPL, we, our)** is required to report annually, for each preceding Financial Year, on the actions it has taken to call out, assess and minimise modern slavery in our operations and supply chain **(Mandatory Requirements)**.

This is a joint modern slavery statement, in accordance with section 14 of the Act, submitted by CPL-Choice, Passion, Life on behalf of Access Arts (CPL) Limited and Cootharinga North Queensland.

What is Modern Slavery?

Modern Slavery describes situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom.

The Act defines modern slavery as including **eight types of serious exploitation**: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour.

The worst forms of child labour are situations where children are subjected to slavery or similar practices or engaged in hazardous work.

Mandatory Requirements

The seven mandatory criteria included in this Joint Modern Slavery Statement are:

Section Name	Mandatory Criteria
Corporate Information	identify the reporting entity.
Our Organisation, Operations and Supply Chain	Describe the structure, operations and supply chains of the reporting entity.
Risk Identification and Mitigation	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls. Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.
Risk Treatment Effectiveness	Describe how the reporting entity assesses the effectiveness of such actions.
Consultation	Describe the process of consultation with any entities that the reporting entity owns or controls; and in the case of a reporting entity covered by a statement under section 14—the entity giving the statement.
Relevant Information	Include any other information that the reporting entity, or the entity giving the statement, considers relevant.

Freedom from slavery is a fundamental human right.

ACKNOWLEDGEMENT OF COUNTRY

Acknowledgement of Country

The CPL Group acknowledges the Traditional Custodians of country throughout Australia, and we pay our respects to Elders past, present, and emerging. We are committed to honouring Aboriginal and Torres Strait Islander peoples and their unique cultural and spiritual relationship to land, water, and seas and their rich contribution to society.



CORPORATE INFORMATION

CPL - Choice, Passion, Life (CPL)



choice • passion • life

Board of Directors

Bruce Cowley Chair

Michael Pini Deputy Chair

Simon Crane Treasurer and Director

Dermot Lindsay Director

Ken MacDonald Director

Robin Grant Director

Stephen Brady Director (resigned 28 November 2020)

Sue Scheinpflug Director

Susan McKee Director

Company Secretaries

Rebecca He Secretary (resigned June 2021)

Anastasia Maynes Secretary

Executive Management Team

Rhys Kennedy Chief Executive Officer

Wendy Lavelle Chief Operating Officer

Julie Byth Chief Experience Officer

Rebecca He Chief Financial Officer (to June 2021)

David Beal Chief Transformation Officer (From June 2021)

Registered Office

CPL - Choice, Passion, Life

Level 2, 340 Adelaide Street, Brisbane, QLD 4000 Postal Address PO Box 386, Fortitude Valley QLD 4000

Telephone 1800 275 753

Email info@cpl.org.au

Australian Company Number (ACN) 009 942 269

Australian Business Number (ABN) 27 009 942 269

To find out more about CPL- Choice, Passion, Life, to view a full listing of our locations or read our Annual Report please visit our website at <u>cpl.org.au</u>

About CPL - Choice, Passion, Life

We are a registered Charitable Not-for-Profit, disability service provider, operating throughout Queensland and Northern New South Wales, and registered with the Australian Charities and Not-for-Profits Commission (ACNC). We are an Australian Public Company, Limited by Guarantee, registered with Australian Securities and Investments Commission (ASIC) in 1975.

We are the leading provider of integrated support, therapy and advice for people living with a disability and their families in Queensland and Northern New South Wales. We work with our clients at every stage of their lives. We deliver the very best support, guidance, technology and understanding possible, so people can achieve the things that matter the most to them.

Our History

The Cerebral Palsy League was founded in 1948 by a group of parents of children with cerebral palsy who felt they were not receiving the services they needed and imagined a better world for their children; we are now known as CPL – Choice, Passion, Life. These families laid the solid foundations for our organisation that has become one of Australia's largest service providers for people with disability.

With the acquisition of Access Arts (CPL) Limited on 1 April 2019, and Cootharinga on 1 July 2020, CPL has grown to become one of Queensland's largest integrated support, therapy and disability services provider.

CPL Group

In March 2020 the members of Cootharinga North Queensland voted in favour of CPL being its sole member from July 2020. Cootharinga North Queensland, along with CPL's wholly owned subsidiary Access Arts (CPL) Limited, are registered as charitable Not-for-Profit entities under the ACNC, and together with CPL- Choice, Passion, Life are referred to collectively as the CPL Group and are included in this Statement.

Our Priorities

Our vision is an "inclusive society for all people". We aim to achieve this by providing the best services and support to our clients so they can live a fulfilling life, as independently as possible, in the community of their choice. This also includes creating and maintaining a sustainable and socially beneficial supply chain and operation that is free from modern slavery practices.

Our Reconciliation Action Plan (RAP)

Following nine months of consultation and development, the CPL Group launched its RAP early June 2021.

The CPL Group's vision for reconciliation is to have equality and meaningful engagement between Aboriginal and Torres Strait Islander peoples and all Australians within the disability sector. Through our professional services and partnerships with Aboriginal and Torres Strait Islander communities, we will build cultural resources, remove barriers to equal participation and develop sustainable employment and business opportunities, while further fostering a culture of respect, understanding and inclusion.



Our Reconciliation Action Plan focuses on four key areas:

- Building relationships to promote reconciliation
- Developing new resources for employees, clients and partners
- Advocating for improved, culturally-relevant disability services for Aboriginal and Torres Strait Islander peoples;
- Continuing to improve education and working towards removing barriers for Aboriginal and Torres Strait Islander peoples.

Our Structure



Trading Names of CPL - Choice, Passion, Life

Trading Names of Cootharinga North Queensland

OUR OPERATIONS

Our Services

For over 70 years, **CPL - Choice, Passion, Life** has supported thousands of Australians to live the life they choose through the delivery of integrated disability support services.

Our integrated approach focuses on getting better outcomes for our clients through the provision of disability support services, which includes community and in-home support, Allied Health services, aged care, community engagement and advocacy, access to a resource and toy library, and Mylestones Employment supports and training.

Our **community and in-home support** provides a diverse range of services for children, teenagers and adults, 24 hours a day, 7 days a week, to make life at home easier for them and their families. Our in-home support includes getting ready for school, work or bed, support with mealtimes, personal care, light domestic duties, overnight assistance and supported independent living arrangements.

Our **therapies** include but are not limited to early childhood intervention programs, Physiotherapy, Occupational Therapy, speech and language pathology, social work and counselling, interactive group-based therapy for children and hydrotherapy.

We provide early childhood intervention programs for children under seven years old who may not be reaching their development milestones. The programs are provided by our experienced therapists and are focused on enhancing the child's learning and skill development. Early childhood intervention services can reduce the amount of supports needed later in life.

Our diverse range of **allied health** services can help build strength, endurance, movement, social and fine motor skills to help clients build their independence and achieve their goals. Our Speech and Language Pathologists work with people who have difficulty with communication, literacy, speech and language. Our Social Workers work with their clients and families to support them through life's ups and downs by providing practical strategies, valuable advice, advocacy and a listening ear.

As a **specialist disability accommodatio**n and **supported independent living** service provider, we support our clients to live the life they choose, in their own home. Our Direct Support Workers are there to our clients and their families with everyday activities, errands, catch ups with friends and attending events and performances.

Through our **aged care services**, we support our clients in-home and in the community with the support they need as they age. Our focus is to maintain our clients' independence, so they can stay in their own home longer. We provide advice on assisted daily living supports and equipment and make recommendations on home modifications to make it easier to get around safely.

We support our clients to achieve their goals and live the life they want through the provision of our integrated disability support services.

Further information on our integrated disability support services is available at <u>www.cpl.org.au/disability-services</u>.

For almost 30 years, **Mylestones** businesses (<u>www.mylestones.org.au</u>) continue to be focused on creating more opportunities for people with barriers and disabilities to find work, earn an income, gain independence, develop new skills and follow their passions.

Mylestones Solutions is a local Disability Social Enterprises and Australian Disability Enterprise operating in multiple locations in Queensland. Mylestones Solutions create employment opportunities for Queenslanders with barriers to work, including Coffee Carts, lawns and landscaping, as well as minor property maintenance such as changing lightbulbs and paint touch ups. **Mylestones Printing** is an Australian Disability Enterprise located on the northside of Brisbane. We employ over 50 people with a disability, to provide commercial services including printing, mailing, packaging, resource recovery (recycling), pick and pack, binding and finishing.

Mylestones Employment is a Disability Employment Service that supports job seekers to find long term employment in jobs they love. We support job seekers to create customised job plans based on their goals, skills and aspirations, and provide tailored pre-employment supports, job placement, onsite training and employer assistance.

Mylestones Training is a Registered Training Organisation (RTO) that was established to help support the continued growth of a strong, skilled and sustainable disability sector.

My Life Consultancy provides National Disability Insurance Scheme (NDIS) support coordination. and work with NDIS participants to help them understand the support categories and funding available in their NDIS plan.

Rai Collective is an online shop (<u>www.rai.org.au</u>) dedicated to selling creative works from talented artists with disability. Rai allows artists to showcase and sell their pieces to the world.

Camp Have a Chat supports children, aged six to 18 years, with communication difficulties to learn to speak using communication devices and technologies. Sessions incorporate fun activities like visual arts, drama performances, music and more. Campers make new friends and learn new communication skills, all in a fun, supportive environment

Screech Theatre, known as Screech Arts (<u>www.screecharts.org.au</u>), is an innovative and inclusive performing arts school for creative spirits of all ages and abilities. Screech Arts is focused on building self-expression and providing creative training and performance opportunities for all. With weekly classes, participants can discover, evolve and unleash their creativity through drama, acting, dance, film, music, singing, production, scriptwriting and set design.

Our Subsidiaries

Our wholly owned subsidiaries, **Access Arts** and **Cootharinga North Queensland**, support our integrated approach to providing a diverse range of disability support services to the local communities.

Access Arts (<u>www.accessarts.org.au</u>) has been working to support people with disability or disadvantage for 37 years. We believe that everybody deserves quality access to arts activities and the opportunity to work towards a career in the **arts**. Our work is widely recognised, and our artists excel across all art forms. We also reach out to the community, listen to what people want and provide professionally facilitated arts workshops that give our members a creative outlet.

We are passionate about pioneering opportunities for people who experience disability or disadvantage to excel in the arts. One in five Australians live with disability; many more are unable to participate in the arts due to disadvantaged circumstances. We assist artists to develop their practice in all art forms, at all levels. We support our vision that everyone is free to enjoy, participate, create and work in the arts. **Cootharinga North Queensland** (<u>www.cootharinga.org.au</u>) has been supporting the local community in North Queensland since 1951. We provide supports and services to a large variety of clients throughout North Queensland. Our supports and services assist those living with an impairment, whether permanent or temporary, that impacts their daily living, through to ageing.

We provide a person-centred approach that allows for a custom-designed service ensuring that they receive flexible, responsive and innovative supports that help achieve their goals and meet their individual needs.

At Cootharinga we provide assistance in home and community support, support coordination, equipment solutions, skills and transition services, Allied health services, the community and activity hub, skills and transition, aged care home care packages and the Babinda Bargain Centre.

Our highly experienced and trained staff provide **assistance in home and community support**, through actively work with people living with disabilities to assist them to achieve the life they want. We provide assistance with daily living, supported independent living, and social and community participation. We encourage individual positive outcomes through the coaching of effective life skills, building confidence and the development of abilities.

Our team of **support coordinators** work with our clients to understand their goals and ambitions, source service providers that are appropriate, and implement their NDIS plan to ensure our clients gain the most benefit from their NDIS Plan.

At **equipment solutions**, we enhance the lives of individuals through providing tailored, ergonomic adjustments and modifications for wheelchairs and mobility equipment. We are North Queensland's only specialised wheelchair and lifestyle solutions service provider. Our technicians are qualified and provide a professional service and workmanship to ensure our community have comfortable, fit-for-purpose and reliable assistive technology.

Our **allied health team**, work with our clients and their families to build a tailored solution that suits our clients' needs. Our allied health services include speech pathology, physiotherapy, occupational therapy, continence advisory services, and allied health assistants under the direction of a licenced therapist.

The **Cootharinga community and activity hub** (The Hub) offers centre and communitybased programs designed to improve self-confidence, social interaction and community inclusion. The Hub is located in Townsville and is open 7 days a week, 365 days a year with our qualified support workers assisting customers in all specific skill development to achieve their goals.

Our learning and social skills program, **skills and transition**, is focused on our clients developing skills to live independently, prepare for transition to employment, further study, volunteering or connecting with community groups. Skills and transition started in Townsville in 2016 and has since expanded to Mount Isa and Cairns.

We provide **home care packages** in remote and very remote locations throughout North Queensland. Our home care packages are designed to assist older people and further support their health, well-being and independence at home and in the community. These packages can include care services (assisted daily living), support services to get our older clients out and about in the community, and clinical care services to help our older clients achieve optimal health.

At Cootharinga, our purpose is to assist people to live the life they want, and our vision is to build a better world with people of all abilities.

Further information on our person-centred disability support services is available at https://www.cootharinga.org.au/our-services/

Our Achievements

On 1 July 2020, **CPL - Choice, Passion, Life** became the sole member of **Cootharinga North Queensland**, enabling the CPL Group to expand to support approximately 14,000 people with a disability or barrier to independence across a broad geographic footprint spanning from the Far North of Queensland to the Northern Rivers of New South Wales.

CPL's priority of ensuring clients have access to modern, fit-for-purpose environments in which to live and grow was evidenced through the relocation or upgrading of several sites. **CPL** consolidated its operations in **Hervey Bay** to create a centralised hub incorporating its employment, allied health and support in the community services. A new hub was also established at **Mermaid Beach**, offering – for the first time – a support in the community program in central Gold Coast. Importantly, these two relocations brought together CPL's local teams, helping them to share ideas and work collaboratively for the benefit of clients.

Throughout the year, **CPL** also worked collaboratively with developers and housing providers to **improve access to housing options**, both for those eligible for specialist disability accommodation and those funded for supported independent living.

During FY2021, **Access Arts** partnered with CQ Regional Arts Services Network (CQRASN), Woorabinda Shire Council, Woorabinda PCYC, Wadja Wadja Primary School and Woorabinda Women's Group for **Community Coming Together**. One of the great outcomes of this partnership was Woorabinda Primary School saw such value in this initiative, they created a new paid permanent part-time Artist in Residence position for First Nations artist Roxanne Oakley. Roxanne was also awarded the 2020 Woorabinda Deadly Award for best community artist. Community Coming Together ran from August to December 2020. Components included professional development, mentoring and support to local young people.

Minjerribah Dance Lab, a three-day dance Lab, 9-11 November 2020, produced by BlakDance in partnership with **Access Arts**, Creative Arts Alliance, City of Gold Coast and Queensland Yoolaburrabee Aboriginal Corporation, proved a pilot initiative that provides a model which could potentially be delivered in other communities. First Nations emerging dancers came together on Quandamooka Country and participated in a cultural exchange through learning new techniques to create dance and storytelling that connects Kinship and Country.

Our People

As at 30 June 2021, **we employed 3,696 people** collectively at the CPL Group across **24 Local Government Areas** throughout Queensland and Northern New South Wales. 73% of our people across the CPL Group **identify as female.**

Our people operate in the following business streams, including but not limited to disability support, allied health, community and in-home support and aged care, employment and training services, the arts, social enterprises, and corporate services.

During the reporting period, we provided over **2.16 million hours of support** and delivered more than **33,300 hours of therapy to 13,040 clients.**

Through Mylestones Employment, we placed more than **1,700 people into jobs** and assisted **550 people to access training** to build their skills, confidence and employment prospects.

At Mylestones' Solutions social enterprises, over **92,000 hours of paid work** was undertaken by supported employees, and **2,737 lawns mowed** by our hard-working Garden Crews.

During the 2021 reporting period, **889 participants** took part in **198 Access Arts' workshops**. Artists were presented with opportunities to sell, showcase and perform their work, and reached a total audience of 18,780 during the year.

Our Footprint

Our footprint includes and mix of integrated hubs across 24 Local Government Areas. Collectively, we maintain and operate over 232 sites; a mix of Mylestones Employment centres, integrated service and allied health centres, supported independent living and specialist disability accommodation sites, across Northern New South Wales and across Queensland.

With the support of our specialist Indigenous supply partners, we provide services to over 740 First Nation's peoples from the Bundjalung Nations up to the Yidinjdji Nations and out to the Kalkadoon Nations.

Impact of COVID-19 on Our Services

The importance of continued high-quality and safe disability services was never more evident than in the 2021 financial year. As we continued to meet the individual needs of our clients through the complexity of COVID-19 and the rapidly changing conditions and directives were, at times, the focus of our efforts.

During the 2021 financial year we provided over 1,200 hours of allied health services via telehealth. Almost 50 per cent of the telehealth services were delivered outside of the lockdown periods, supporting people in regional and remote areas and/or with limited access to travel.

COVID-19 has seen a new way of working and engaging with our people and our clients. As a result of this, we have changed the way we work, to focus on a remote working and virtual engagement. We have increased our portable ICT footprint across the organisation and shifted from allocated desks and seating to hot desking and rotational days/ weeks to attend the office. Our people, in non-client facing roles, were provided the opportunity to formally transition to flexible working arrangements, enabling a mix of working from home and in the office.

Impact of COVID-19 on Our Supply Chain

COVID-19 saw the reliability and assurance of our supply chain deplete. To ensure continuity of supply for our clinical personal protective equipment (PPE) and information communication and technology (ICT) goods, we sourced new products and suppliers throughout the financial year. This meant that standardisation of product and supplier was not able to be maintained throughout the year.

We were forced to meet the volatile market pricing and volume demands, thus reducing our ability to rely on consistent supply and increasing our costs to keep our people safe. The changing infection prevention and control (IPC) guidelines for the healthcare and disability sector also had a negative impact on our ability to maintain suitable PPE. This was due to the increased IPC measures required for various applications, cohorts and locations.

During the 2021 financial year we partnered with some reliable PPE suppliers based in Queensland and New South Wales, that were able to supply us with clinically suitable and TGA registered products. Due to the raw material shortages, we were paying substantially more for nitrile gloves, and N95/P2 (fit-tested) respirators due to the international hold on supply.

COVID-19 also forced the implementation of an inhouse warehousing and supply chain solution at Strathpine, Queensland, providing all our sites with clinically suitable PPE. The orders were picked, packed and shipped from our Mylestones Printing site and sent to Northern New South Wales and all of Queensland, including Cootharinga North Queensland, by our supported workers.

This initiative ensures our people's safety whilst on the job and provides valuable and meaningful supported employment. The CPL Group Procurement Manager leads the PPE supply chain with the support of the Mylestones Printing team and the leadership team.

Our Response to COVID-19

Our ongoing response to COVID-19 was to support the safety and wellbeing of our clients and employees; and to continue delivering our essential services safely.

Though conditions sporadically changed throughout the year, the processes and protocols we developed at the start of the pandemic, laid the foundations for a coordinated and timely response. Our response included:

- Continuation of multidisciplinary COVID working group meetings to monitor the situation and introduce service changes and initiatives as required;
- Introduction of contact tracing initiatives, including QR code check in systems, prior to mandating;
- Rapid-response communication campaigns to inform our people and our clients of changes to conditions as and when they occurred;
- Development of PPE guidelines and framework to ensure standardisation, consistency and application of PPE for our people and our clients;
- Deployment of in-depth PPE training for our frontline people across all sites; and
- Workforce planning and service delivery continuity strategies.

OUR SUPPLY CHAIN

Our Procurement Spend

Although our supply chain is predominantly local, it is diverse. With a procurement spend of over \$34 million, we procure clinical, and therapeutic consumables, pharmaceuticals, therapeutic, allied health and other professional services, linen services, textiles, personal protective equipment (PPE), agency labour, facilities and fleet management services, information communication and technology (ICT) goods and services, freight and logistics, marketing and general office administration goods and services. Over 62 per cent of our consolidated spend is associated to corporate services.

Figure 1 - FY2021 Procurement Spend by Category



Our Suppliers

As at 30 June 2021, we had 1,244 suppliers in our supply chain support the CPL Group.

The current breakdown of our tier one suppliers is, 1.1% international (UK, USA and Singapore) ICT software / service providers, 69.9% Queensland based and 18.3% New South Wales, 7.7% Victorian and 2.9% across the rest of Australia.

Except for our COVID-19 clinical PPE supply assurance response, the majority of our suppliers are longer term suppliers of goods and services, who have supported us for in excess of five years.

The new suppliers and our higher risk longer term suppliers (as identified in Table 1 below) will be reviewed and evaluated over the next 18 months to ensure, both us and our supplier(s) are reducing and/or removing any potential or actual modern slavery risk.



Figure 2 - Our Supply Chain (Level 1)

RISK IDENTIFICATION AND MITIGATION

We are committed to improving the effectiveness of our supplier onboarding processes and modern slavery controls across our supply chain. We will wittingly:

- avoid, not cause or contribute to adverse impacts on anyone's human rights through our own activities;
- seek to prevent or mitigate adverse human rights impacts that are directly linked to our operations, products or services by our business relationships, even if they have not contributed to those impacts; and
- address, call out and report modern slavery practices that may be caused by, contributed to or directly linked to us or any of our operating entities.

We are committed to enhancing our modern slavery risk identification, mitigation and controls over the next eighteen months. We have undertaken a preliminary modern slavery risk assessment across the supply chain and operations, identifying categories that are a higher risk of modern slavery practises occurring. The results are detailed in Table 1 - Supply Chain and Operational Modern Slavery Risk Assessment.



Table 1 - Supply Chain and Operational Modern Slavery Risk Assessment

SUPPLY CHAIN

Information, Communications and Technology	postage, logistics, telecommunications and computer expenses	20.0%	Complex - Various levels of supply chain, 2+ tier's unknown	Плкломп	Unknown / Potential to be directly linked to, contribute to or cause modern slavery practices	Medium	Potential modern slavery risks within tier two (+) of the supply chain, specifically related to ICT equipment and the provision of services being outsourced to international.	Over the next eighteen months, CPL will be engaging with Suppliers (tier one supply chain) from targeted Categories to analyse and review the first and second tiers for potential modern slavery risks.
Facilities	maintenance and repairs, cleaning, security and other property and facilities management services.	%8.47	Complex - Various levels of supply chain, 2+ tier's unknown	Unknown	Unknown / Potential to be directly linked to, contribute to or cause modern slavery practices	Medium	Potential modern slavery risks within ther two (+) of the supply chain management and the provision of cleaning goods and services, security and maintenance.	Over the next eighteen months, CPL will be engaging with Suppliers (tier one supply chain) from targeted Categories to analyse and review the first and second tiers for potential modern slavery risks. CPL will be establishing modern management framework, and a slavery procurement and contract management framework, and a inclusive of calling out, addressing and treating modern slavery in the supply chain.
Client Related	PPE, pharmaceuticals, therapeutics and other client related goods and services	0.4%	Complex - Various levels of supply chain, 2+ tier's unknown unknown	Unknown	Unknown / Potential to be directly linked to, contribute to or cause modern slavery practices	Medium	Potential modern slavery risks within ther two (+) of the supply chain related to the provision of goods, provision PPE, pharmaceuticals and therapeutics.	Over the next eighteen months, CPL will be engaging with Suppliers (tier one supply chain) from targeted Categories to analyse and review the first and second tiers for potential modern slavery risks. CPL will be establishing modern slavery procurement and contract management framework, and a supplier code of conduct, that is inclusive of calling out, addressing and treating modern slavery in the supply chain.
Commercial, Administration and Support	printing, office consumables, travel, finance and professional services	35.0%	Reasonably Complex - Various levels of supply chain 3+ tier's unknown	Unknown	Unknown / Potential to be directly linked to, contribute to or cause modern slavery practices	Moderate	Potential modern slavery risks within tier three (+) of the supply chain.	Modern slavery risk review and identification targeted for subsequent Financial Years.
Marketing	Advertising and promotional	4.0%	Tier 1+ supply chain unknown	Unknown	Unknown / Potential to be directly linked to, contribute to or cause modern slavery practices	Now	Potential modern slavery risks within tier three (+) of the supply chain.	Modern slavery risk review and identification targeted for subsequent Financial Years.

OPERATIONAL								
Recruitment / Onboarding	Engagement of employees	Undetermined	NA	Unknown	Directly linked to modern slavery practices	Low	CPL's personnel are engaged under a locally compliant employment contract or an Enterprise Bargalning Agreement (EBA) or an Award in or an Award in or an Award in or an Award in relevant legislation.	CPL has a detailed recruitment and onboarding process coupled with an agreed EBA and relevant Award(s).
Agency Labour	short-medium term skilled and unskilled labour hire	Undetermined	Tier 1+ supply chain known	Unknown	Directly linked to modern slavery practices	Low	Personnel engaged under short term albour hrie (skilled and unskilled) contracts are sourced from reputable agencies and rewarded accordingly.	Modern slavery risk review and identification targeted for subsequent Financial with the inclusion of contracting framework and a supplier code of conduct
Client Related Services	including, but not limited to allied health and in-home care services are occasionally provided by sole traders and other organisations to support CPL personnel in the delivery of integrated disability support services to its clients	18.9%	Tier 1+ supply chain unknown	Unknown	Directly linked to modern slavery practices	Low	Client related services, including, but not limited to allied health and in- home care services are provided by sole traders and other organisations to support CPL personnel in the delivery of integrated disability support services to its clients.	Modern slavery risk review and identification targeted for subsequent Financial Years, with the inclusion of contracting firameork and a supplier code of conduct

Category

Summary of Modern Further action required Slavery Risks

Risk Rating

Types of Cause / Contribute/ Linked to Exploitation modern slavery practices

% Procurement Supply Chain Spend

Goods / Services

RISK TREATMENT EFFECTIVENESS

We have commenced the process of uplifting our supply chain, procurement and contracting practices, and framework to incorporate Social Procurement and address modern slavery. As a part of this uplift, we will further develop the roadmap for how we will continue to improve our identification, assessment and evaluation of modern slavery risks and controls in our supply chain.

We have implemented a supplier onboarding system enabling suppliers to manage their onboarding and as a part of the process, our supplier must complete a modern slavery questionnaire. As at 30 June 2021 over 106 suppliers had completed their modern slavery questionnaire, thus raising awareness of the potential injustices within supply chains and drawing attention to better compliance and outcomes.

Figure 3 - CPL Group Procurement Uplift



CONSULTATION

This joint Modern Slavery Statement has been prepared by us (CPL – Choice, Passion, Life) in consultation with Cootharinga North Queensland and Access Arts (CPL) Limited and has been approved by the Board of CPL – Choice, Passion, Life on 27 November 2021.

The process of consultation undertaken by the CPL Group's Procurement Manager to develop the CPL – Choice, Passion, Life Joint Modern Slavery Statement, involved the engagement and input from CPL, Access Arts and Cootharinga's key stakeholders, across procurement, finance, human resources, business and data insights, marketing, Mylestones, the service delivery streams, and the CPL Group's Executive team.

This joint statement is made in accordance with section 14 of the Australian Modern Slavery Act 2018 (Cth). It represents the Reporting Entity's joint statement on modern slavery for the financial year ended 30 June 2021.

Bruce Cowley Chair, CPL Board of Directors

Rhys Kennedy CEO, CPL - Choice, Passion, Life

SUBSIDIARY COMPANY INFORMATION

ACCESS ARTS (CPL) Limited (AACPL)

ACCESS ARTS

Board of Directors

Thomas Bradley Chair

Bree Hadley Director

Bruce Cowley Director

Dermot Lindsay Director

Julie Byth Director

Ken MacDonald Director

Nigel Lavender Director

Rhys Kennedy Director

Wendy Lavelle Director

Executive Management Team

Pat Swell Chief Executive Officer

Registered Office

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To find out more about Access Arts (CPL) or read our Annual Report, please visit our website at **accessarts.org.au**

COOTHARINGA NORTH QUEENSLAND (CNQ)



Board of Directors

Robin Grant Chair

Agatha Comis Secretary

Bruce Cowley Director

Ken MacDonald Director

Kevin Byrne Director

Rhys Kennedy Director

Sharon Kelly Director

Simon Crane Director

Executive Management Team

Matt Kinnane Chief Executive Officer

Jody Goldring Chief of Human Resources and Business Compliance (to 7 May 2021)

Anthony Higgins General Manager Finance

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Australian Company Number (ACN) 009 656 679

Australian Business Number (ABN) 92 009 656 679

To find out more about Cootharinga North Queensland, to view a full listing of our locations or read our Annual Report please visit our website at **cootharinga.org.au**